

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
v.	§	NO. 15-CR-4268-JB
	§	
ANGEL DELEON, ET AL.,	§	
	§	
Defendants.	§	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO  
MOTIONS IN LIMINE**

COMES NOW, Defendant Edward Troup, by and through undersigned counsel, and submits this Unopposed Motion for Extension of Time to File Responses to Motions in Limine on behalf of all Co-Defendants. As grounds, Mr. Troup respectfully submits the following:

1. On December 1, 2017, the government filed the following Motions in Limine (MIL):
  - MIL to Preclude Questioning Government Witnesses Regarding Personal Information [Doc. 1520];
  - MIL to Exclude Any Reference to Punishment or Sentencing [Doc. 1521];
  - MIL for a Pretrial Order Permitting the Prosecution to Present Witness Testimony in Installments [Doc. 1522];
  - MIL to Allow Transcripts Containing English Translations of Recorded Spanish Conversations as Substantive Evidence [Doc. 1523]; and
  - MIL to Preclude Soliciting Testimony About Sensitive Government Recording Devices and Programs [Doc. 1524].

2. On December 1, 2017, the government also filed United States' Notice of Intent to Use Evidence Pursuant to Rule 609. [Doc. 1525]

3. The responses to these motions [Docs. 1520-1524] and notice [Doc. 1525] are due December 15, 2017. The Defendants require additional time to respond to these Motions in Limine and are seeking an extension to file said responses until December 27, 2017.

4. Assistant United States Attorney Maria Armijo indicated the government is not opposed to this request for extension.

5. As noted *supra*, Counsel for all remaining Co-Defendants JOIN in the instant motion.

WHEREFORE, PREMISES CONSIDERED, Defendant Edward Troup, on behalf of all remaining Co-Defendants, respectfully requests that this Court grant an extension of time in which to file responses to the government's Motions in Limine until December 27, 2017.

DATED: December 15, 2017.

Respectfully submitted,

/s/ Cori A. Harbour-Valdez  
Cori A. Harbour-Valdez  
The Harbour Law Firm, PC  
P.O. Box 13268  
El Paso, TX 79913  
Phone: 915-544-7600  
Fax: 915-975-8036  
[cori@harbourlaw.net](mailto:cori@harbourlaw.net)

&

/s/ Patrick J. Burke  
Patrick J. Burke  
Patrick J. Burke, P.C.  
999 18<sup>th</sup> Street, Suite 2055  
Denver, CO 80202  
Phone: 303-825-3050  
Fax: 303-825-2992  
[Patrick-j-burke@msn.com](mailto:Patrick-j-burke@msn.com)

*Counsel for Edward Troup (3)*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2017, I e-filed the foregoing to the Clerk of the Court via the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Cori A. Harbour-Valdez  
Cori A. Harbour-Valdez